Case 1:24-cv-01193-BAM Document 12 Filed 12/18/24 Page 1 of 3 1 Melissa Newel (#148563) **NEWEL LAW** 2 2625 Alcatraz Ave., Suite 132 Berkeley, CA 94705 3 (510) 316-3827 mnewel@newellawfirm.com 4 5 Attorney for Plaintiff JACQUELINE NAVARRO 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 JACQUELINE NAVARRO, No. 1:24-CV-01193 (BAM) 12 Plaintiff, 13 STIPULATION FOR BRIEFING v. EXTENSION; [PROPOSED] ORDER 14 **COMMISSIONER OF** SOCIAL SECURITY, 15 Defendant. 16 17 18 19 20 21 22 23 24 On October 4, 2024, Plaintiff Jacqueline Navarro filed the instant civil action for judicial 25 review of the defendant Commissioner of Social Security's decision denying her application for 26 Social Security disability benefits. (ECF Doc. 1) The Defendant responded to Plaintiff's 27 Complaint on November 25, 2024. (ECF Doc. 10) Pursuant to the Court's Scheduling Order, 28

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1 Plaintiff's motion for summary judgment is currently due to be filed on or before December 26, 2 2024. (ECF Doc. 5 at p.2: 15-16) 3 The parties hereby stipulate that the date for Plaintiff's motion be extended by thirty (30) 4 days, due to a death in Plaintiff's counsel's family. This is Plaintiff's first request for an 5 extension. The defendant has no objection to the requested extension. 6 Respectfully submitted, 7 Dated: December 18, 2024 **NEWEL LAW** 8 By: Melissa Newel 9 Melissa Newel Attorney for Plaintiff 10 JACQUELINE NAVARRO 11 Dated: December 18, 2024 PHILLIP A. TALBERT 12 **United States Attorney** MATTHEW W. PILE 13 Associate General Counsel 14 Office of Program Litigation, Office 7 15 Justin L. Martin By: 16 JUSTIN L. MARTIN Special Assistant United States Attorney 17 Attorney for Defendant 18 **ORDER** 19 20 Good cause having been shown, Plaintiff's request for an extension of time of thirty (30) 21 days to file her motion for summary judgment is GRANTED. Plaintiff's motion for summary 22 judgment shall be filed on or before January 27, 2025. All other deadlines in the Court's 23 Scheduling Order are modified accordingly. 24 IT IS SO ORDERED. 25 /s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE Dated: **December 18, 2024** 26 27 28

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STIPULATION FOR BRIEFING EXTENSION